

September 15, 2016

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Donna Rawls, Paralegal
999 E Street NW
Washington, DC 20436

RE: MUR 7131

Dear Commissioners:

I write on behalf of NGP VAN, Inc. ("NGP VAN") in response to the complaint filed in the above referenced matter alleging that NGP VAN conspired to violate 18 USC § 603, House Ethics Rules, or any other unspecified provisions of the Federal Election Campaign Act of 1971 and Federal Election Commission regulation. NGP VAN is a for-profit company that provides campaign management software to candidates, political committees, and organizations that are engaged in political activity at the federal, state and local level.

The complaint should be dismissed and no action taken in regards to NGP VAN. The complaint fails to identify a single fact upon which the Commission could conclude that there is reason to believe that NGP VAN has violated any provision of the governing law or any provision of the Commission's regulations. This failing is starkly evident in the analysis contained in the complaint which only mentions NGP VAN twice, once to describe that fact that we were owed money by Senior Votes Count and the second to describe the fact that we are a vendor to the committees cited.

NGP VAN only provides software tools that assist committees with filing their disclosure reports. NGP VAN does not, in any way, review or provide oversight of the data that is entered into the software application. Similar to the Commission's own FECFile application, the filing committee is solely responsible for inputting the data into our software application and the resulting output.

The failure to allege any facts that, if true, would constitute a violation means that the complaint must be summarily dismissed as it relates to NGP VAN. The allegations against NGP VAN must not remain unresolved by the Commission. The complaint against NGP VAN is clearly an effort without factual foundation to darken the reputation our company. Summary dismissal is the proper course for this matter and for denying the complainant the publicity it seeks to achieve with this meritless complaint.

Respectfully,

Louis Levine
Sr. Vice President
NGP VAN, Inc.

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signed by
Christal Dennis
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